

6. That based upon a search of the Land Records of Frederick County, Maryland and the Equity Records of this Court, the Plaintiffs' counsel, James R. Shoemaker, has determined that there has not been recorded any court judgment, confirmatory deed or other instrument to correct said title defect.

7. That in order to determine the proper Defendants in this case, Plaintiffs' counsel, James R. Shoemaker, has made reasonable efforts and in good faith to determine who owned said Parcel B at the time(s) during which the Plaintiffs' predecessors in interest adversely possessed said Parcel B, but has been unable to do so.

8. That Plaintiffs' counsel, James R. Shoemaker, searched the title chain to the Plaintiffs' property in the Frederick County Land Records, but could not determine from all relevant deed descriptions who once owned said Parcel B. The relevant Deeds are attached as Exhibit 3 and incorporated herein.

9. That Plaintiffs' counsel's title search of Plaintiffs' property revealed that on June 29, 1956, John G. Droneburg and Marie K. Droneburg conveyed to Edward A. Fitzgerald and Ethel V. Fitzgerald by Deed recorded at Liber 566, folio 307 of the Frederick County Land Records 89 acres and 74 square perches, saving and excepting 1.87 acres referred to as Parcel "A.A." on an unrecorded plat prepared by William C. Humm and Richard P. Humm, dated May 22, 1956, which was supposed to be, but was not, attached to the said Deed and recorded therewith. The said Deed is included in Exhibit 3 attached hereto.

10. That by Deed dated August 16, 1960, John G. Droneburg and Mae E. Droneburg, his wife, and Marie K. Jeffers and Paul M. Jeffers, her husband, conveyed to Wilhelmina H. Stone all that land "containing one acre and eighty-seven perches, more or less, that was reserved in the deed from John